## Exhibit C

## Chida, Zohaib

**From:** Owen, Brent R. <br/> brent.owen@squirepb.com>

Sent: Tuesday, January 24, 2023 8:37 PM

**To:** Moskowitz, Elliot; Haverstick, Rebecca W.; Kinel, Norman N.

Cc: Resnick, Brian M.; McRoberts, Travis; Chida, Zohaib; Saney, Michelle N.

**Subject:** Conferral on Discovery and Extension of the Challenge Period

Elliot.

Given the Court's guidance at today's hearing, we are reaching out to confer about discovery issues and an extension of the challenge period. Please let us know your position by 2 PM tomorrow. We would prefer to avoid bothering the Court, but we are prepared to file a motion absent agreement on the issues below.

- 1. <u>Complete production and written responses to discovery</u>. The First Lien Agent will agree to produce documents responsive to all discovery requests (limited by prior agreements as to scope, search terms, etc., but subject to the Committee requesting additional production following certification of completion of production), provide written responses to the Committee's document requests, and certify that the production has been completed (the "<u>Completion Date</u>").
- 2. <u>Privilege Log</u>. The First Lien Agent will provide a privilege log identifying materials withheld based on the claim of privilege by the Completion Date.
- 3. <u>Deposition</u>. The Frist Lien Agent will cooperate in scheduling the deposition of one or more witness(es).
- 4. <u>Extension of the Challenge Period</u>. The First Lien Agent will agree to extend the Challenge Period to thirty-days after the Completion Date.

Please let us know if you'd like to discuss.

Regards, Brent



Brent R. Owen

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